

PLEASE TAKE NOTICE that on June 28, 2024, the estates of BlockFi Inc. and its debtor affiliates (collectively, “BlockFi” or the “Wind-Down Debtors”), by and through its undersigned counsel, moved before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 for entry of an order substantially in the form submitted therewith as Exhibit A granting the *Wind-Down Debtors’ Motion to Approve KYC/ALM Protocols for US-Based Accounts* (the “Motion to Approve Protocols”) [Docket No. 2349].

PLEASE TAKE FURTHER NOTICE that the Wind-Down Debtors attached to Exhibit A of the Motion to Approve Protocols a schedule (“Original Schedule 1”) of approximately 1700 accounts held by domestic account holders (i) which were flagged for possible KYC or AML issues, and (ii) on account of which claimants would have a claim in excess of the \$10.00 De Minimis Claim Threshold as defined in the Plan.

PLEASE TAKE FURTHER NOTICE that following the filing of the Motion to Approve Protocols, the Wind-Down Debtors continued to review their books and records and determined that Original Schedule 1 included certain parties and omitted other parties erroneously.³

PLEASE TAKE FURTHER NOTICE that the Wind-Down Debtors submit, attached hereto as Schedule 1, a revised schedule (the “Revised Schedule 1”) which reflects the parties subject to the Motion to Approve Protocols following the Wind-Down Debtors continued review.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion to Approve Protocols was scheduled to be held on August 15, 2024 at 11:30a.m. ET before Judge Kaplan at the Clarkson

³ Notwithstanding diligent efforts on the part of BlockFi’s employees (which is comparatively lean due to budgetary and other cost savings measures), the Wind-Down Debtors determined that Original Schedule 1 included certain accounts and omitted other accounts in error, caused principally by data aggregation issues and disparate record keeping practices identified following further review.

S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8.

PLEASE TAKE FURTHER NOTICE that the hearing on the Motion to Approve Protocols will be rescheduled for **August 27, 2024 at 11:30a.m. ET**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a)(2), any objections must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Daniel M. Stolz, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received no later than **August 20, 2024**.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested in the Motion to Seal may be granted without further notice.

Dated: July 29, 2024

Respectfully Submitted,

/s/ Daniel M. Stolz

GENOVA BURNS LLC
Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
dsolz@genovaburns.com
dclarke@genovaburns.com

Local Counsel to the Plan Administrator

Revised Schedule 1

REDACTED